Federal Communications Commission
Express Comment Submission
Proceeding Number: 24-240

Subject: Opposition to NextNav’s Proposal for Reconfiguration of the 902-928 MHz Band

Dear Commissioners,

I am writing to express my strong opposition to the proposal by NextNav to reconfigure the 902-928 MHz band. This proposal, while aiming to improve positioning and timing services, threatens to undermine a broad spectrum of existing and future technological innovations, particularly in the field of mesh networking.

1. Impact on Mesh Networking:
Mesh networking technologies, such as those enabled by the Meshtastic project, rely on the 902-928 MHz band for low-cost, efficient, and robust communication in off-grid and disaster scenarios. These networks are critical for emergency communications, rural connectivity, and community-based services. Restructuring this band could result in significant interference and degradation of these networks, thereby stifling innovation in this vital area.

2. Importance of the 902-928 MHz Band to Technological Development:
The current open access to the 902-928 MHz band has fostered a hotbed of innovation in wireless technologies. Amateurs and professionals alike utilize this spectrum to experiment and develop new communications technologies that have broad applications, including in healthcare, agriculture, and emergency response. Constricting this band could deter future technological advancements.

3. Evidence of Potential Negative Impacts:
Reports and submissions from various stakeholders, including amateur radio operators and public safety officials, have highlighted the potential for significant negative impacts on existing communication systems that are crucial during emergencies (ARRL, 2024). Additionally, studies have suggested that changes in spectrum allocation can lead to unforeseen consequences on dependent technologies (Source: FCC Archives, 2023).

4. Contradiction to Public Interest:
The proposal by NextNav is contrary to the public interest, as it prioritizes commercial gains over public safety and welfare. The potential displacement of amateur and experimental users does not justify the purported benefits, as these community-driven initiatives serve critical public needs that often go unmet by private industry solutions.

In conclusion, I urge the FCC to consider the far-reaching implications of this proposal on the innovation ecosystem and the many communities that rely on the 902-928 MHz band for crucial communication services. It is imperative to protect this resource to ensure continued growth and resilience in our technological infrastructure.

Thank you for considering this viewpoint.

Sincerely,

Benjamin Herd